

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,

Plaintiff,

v.

COPLEY PLAZA 2001, LLC, a Delaware
Limited Liability Company,

Defendant.

CIVIL ACTION NO.

1:04-CV-12076-JLT

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12/17/04

**MOTION OF THE PLAINTIFF TO PERMIT COUNSEL
TO APPEAR PRO HAC VICE**

In accordance with 83.5.3(b) of the Local Rules of the United States District Court District of Massachusetts that governs the admission and practice of attorneys in said District Court, the undersigned respectfully moves for the admission of **John P. Fuller, Esquire**, 12000 Biscayne Boulevard, Suite 609, North Miami, Florida 33181, (305) 891-5199, for purposes of appearing as counsel on behalf of Plaintiff, GEORGE IVERSON, Individually, in the above-styled case.

John P. Fuller certified herewith that he has studied the Local Rules of this Court and is a member in good standing of the Florida Bar; and is admitted to the United States District Court for the Southern, Middle and Northern Districts of Florida, as well as the United States Court of Appeals for the Fifth and Eleventh Circuits. Mr. Fuller's Florida Bar Number is 0276847. There are no disciplinary proceedings against Mr. Fuller in any jurisdiction. A certificate of good standing from the Supervisor,

Pro Hac Vice Motion

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Membership Records of the Florida Bar is attached hereto as Exhibit A. Mr. Fuller is a partner with the law firm of Fuller, Fuller & Associates, P.A. and has been a member of the Florida Bar for over twenty (20) years. An Affidavit of John P. Fuller in Support of this Motion to Admit Counsel Pro Hac Vice is attached hereto as Exhibit B.

In further support of this motion, it is hereby designated that O. Oliver Wragg is a member of the Bar of this Court. He is also a person to whom the Court and Counsel may readily communicate and upon whom papers may be served.

Mr. Fuller is familiar with the Local Rules of the United States District Court for the District of Massachusetts and his application for leave to practice in this court is on motion of a member of the bar of this court, who has already appeared as counsel for the Plaintiff, GEORGE IVERSON, Individually. Additionally, Mr. Fuller has also submitted the required \$50.00 filing fee to the Clerk of the U.S. District Court.

WHEREFORE, the plaintiffs request that this Court grant John P. Fuller permission to appear before this Court pro hac vice.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the Plaintiffs made a good faith attempt to obtain concurrence to the relief sought in this motion and counsel for defendant have conferred with opposing counsel and opposing counsel have assented to the foregoing motion.

Respectfully submitted,

O. Oliver Wragg with express
O. Oliver Wragg, Esquire, (BPO#: 643152) *per minor*
Of Counsel
FULLER, FULLER AND ASSOCIATES, P.A.
12000 Biscayne Blvd., Suite 609
North Miami, Florida 33181
Tel: (305) 891-5199
Fax: (305) 893-9505

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished via
e-mail on this 15 day of December, 2004 to:

Laurence J. Donoghue, Esq.
Morgan, Brown & Joy, LLP
One Boston Place
Boston, MA 02108
E-mail: ldonoghuei@morganbrown.com
Tel.: (617) 523-6666

O. Oliver Wragg with
O. Oliver Wragg, Esq. *express*
per minor



The Florida Bar

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State of Florida)

County of Leon)

In Re: 276847
John Paul Fuller
Fuller Fuller & Associates, PA
12000 Biscayne Blvd., Ste. 609
North Miami, FL

C I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The
O Florida Bar.

P I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of
Y Florida indicate that said attorney was admitted to practice law in the State of Florida on July 3,
1979.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above
attorney is a member of The Florida Bar in good standing.

Dated this 9th day of December, 2004.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/lpth7:R10

